



1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

Writer's Direct Access
Timothy A. Doughty
(202) 434-4271
doughty@khlaw.com

August 1, 2019

Via ECFS

Marlene J. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

**Re: Commonwealth Edison Company's Third Set of Responses to
Complainant Crown Castle Fiber LLC's First Set of Interrogatories
(Proceeding Number 19-170; Bureau ID Number EB-19-MD-005)**

Ms. Dortch:

Please find attached Commonwealth Edison Company's Third Set of Responses to Complainant Crown Castle Fiber LLC's First Set of Interrogatories in Proceeding Number 19-170; Bureau ID Number EB-19-MD-005. The Confidential Version of these Responses has been filed with the Secretary's Office and served on Crown Castle Fiber LLC's counsel.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Doughty', is written over a light blue circular background.

Timothy A. Doughty
Attorney for Commonwealth Edison Company

Enclosures

cc: Rosemary McEnery, Enforcement Bureau
Adam Suppes, Enforcement Bureau

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

_____)	
)	
Crown Castle Fiber LLC)	
<i>Complainant,</i>)	
)	Proceeding Number 19-170
v.)	Bureau ID Number EB-19-MD-005
)	
Commonwealth Edison Company,)	
<i>Defendant</i>)	
_____)	

**COMMONWEALTH EDISON COMPANY’S THIRD SET OF RESPONSES
TO COMPLAINANT’S FIRST SET OF INTERROGATORIES**

Defendant Commonwealth Edison Company (“ComEd”), pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submits the following third set of Responses to the First Set of Interrogatories of Complainant Crown Castle Fiber LLC (“Crown Castle”) to ComEd related to its Rate Complaint captioned above (the “Complaint”).

INTERROGATORIES

INTERROGATORY NO. 8:

For each year from 2012 to 2018, provide the aggregated total of ComEd’s capital costs and associated depreciation reserve for appurtenances included in FERC Account 364.

RESPONSE: Consistent with and without waiving its June 26, 2019 Objections, please see Exhibit A to this Response.

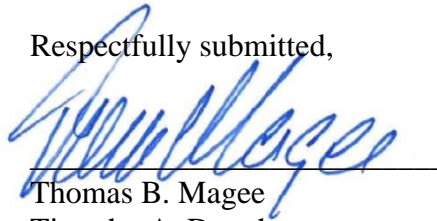
INTERROGATORY NO. 10:

If You contend that Crown Castle, including Sunesys, Lighttower, and Crown Castle

NG Central, has not paid You in full for any annual pole attachment rental, identify the invoice or invoices that you contend has not paid in full.

RESPONSE: Consistent with and without waiving its June 26, 2019 Objections, ComEd has yet to issue its 2019 invoices for pole attachment rental, but otherwise Sunesys, Lightower, and Crown Castle NG Central have paid ComEd's annual pole attachment rental invoices in full. As explained in ComEd's Answer, however, ComEd is confused about the relationship between Crown Castle and Sunesys, Lightower, and Crown Castle NG Central.

Respectfully submitted,

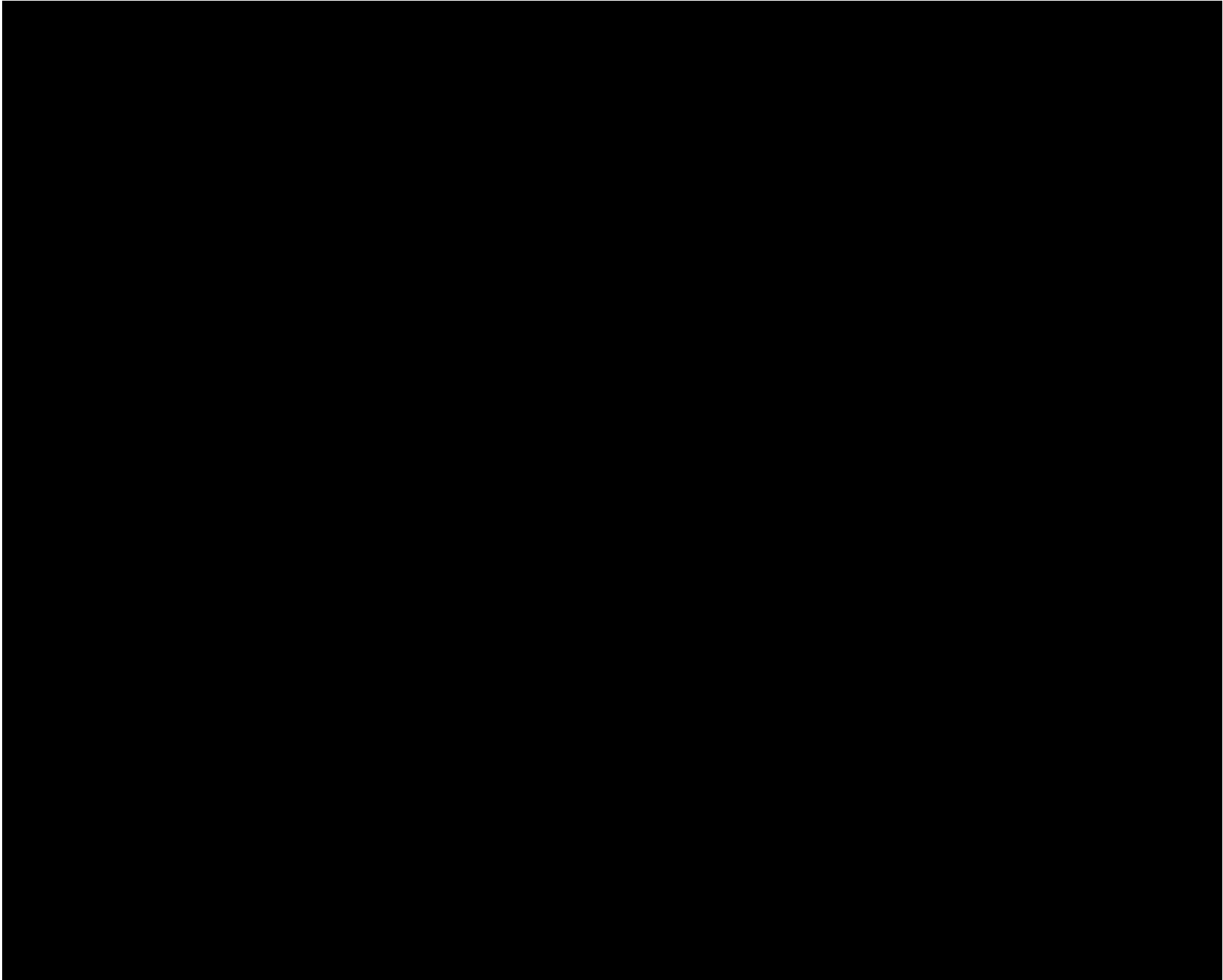


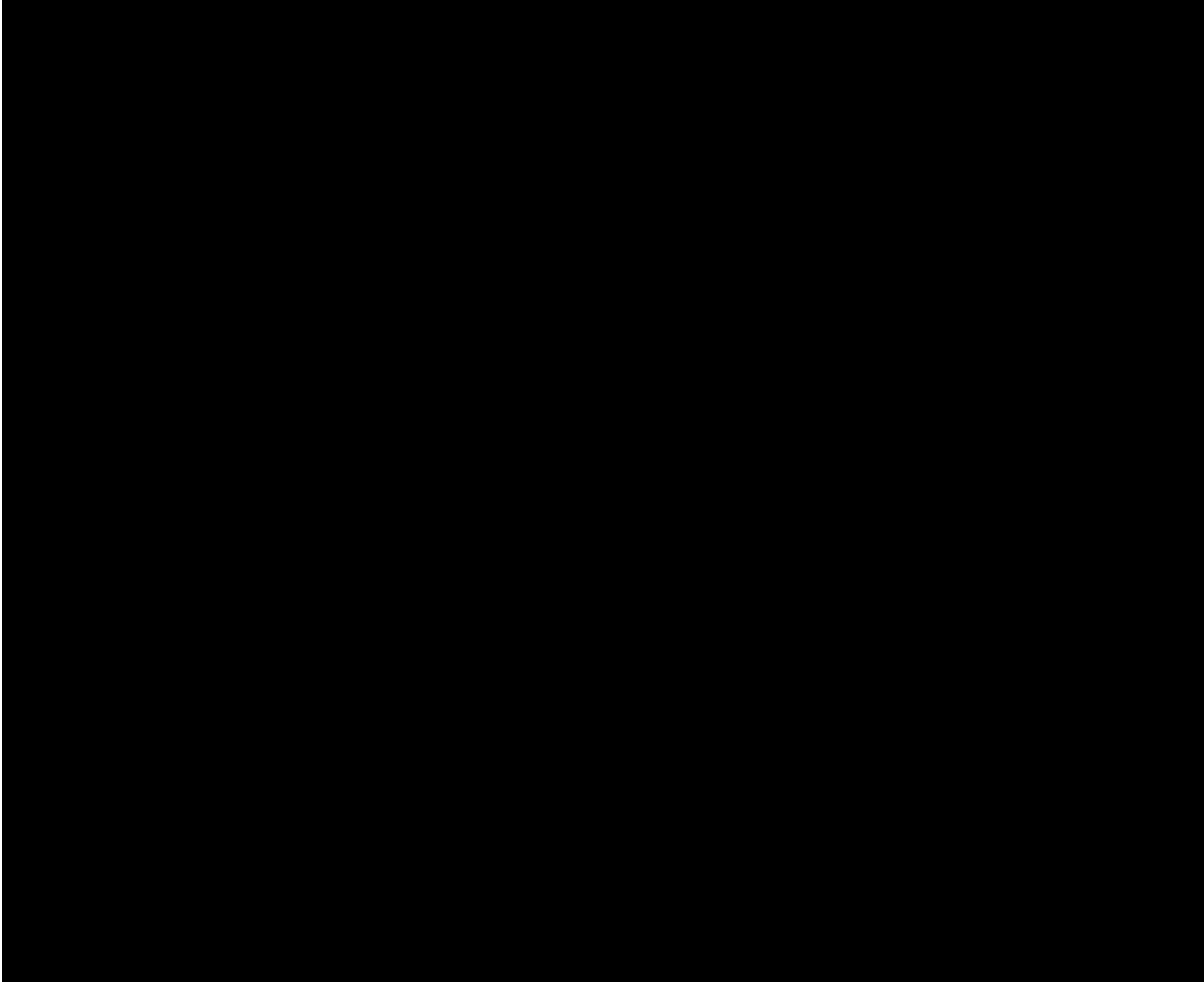
Thomas B. Magee
Timothy A. Doughty
Keller and Heckman LLP
1001 G Street NW
Suite 500 West
Washington, DC 20001
(202) 434-4100 (phone)
(202) 434-4646 (fax)
magee@khlaw.com
doughty@khlaw.com

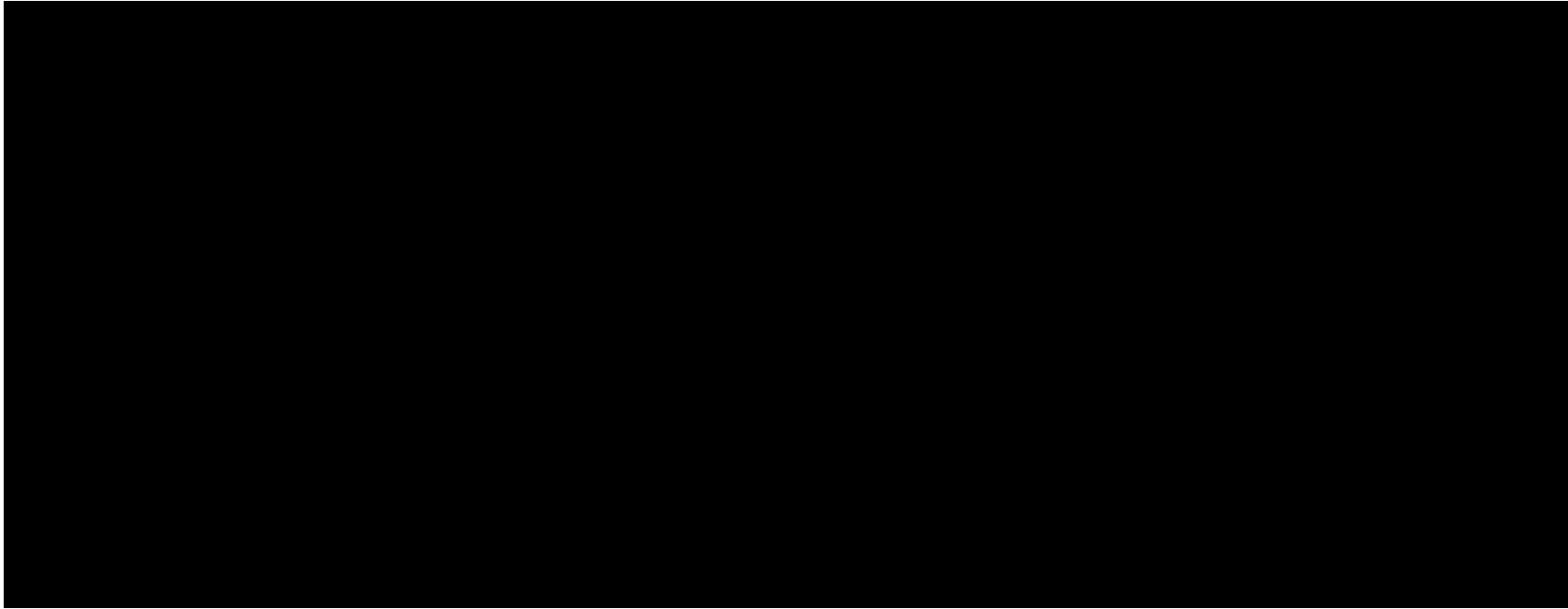
Attorneys for Commonwealth Edison Company

August 1, 2019

EXHIBIT A





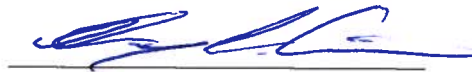


**AFFIRMATION
OF
BRADLEY R. PERKINS,
COMMONWEALTH EDISON COMPANY**

I, Bradley R. Perkins, do affirm as follows:

1. My name is Bradley R. Perkins. I serve as Assistant General Counsel at Commonwealth Edison Company ("ComEd"); and
2. I attest that the information identified in ComEd's Third Set of Responses to Complainant Crown Castle Fiber LLC's First Set of Interrogatories in the Rate Complaint was gathered under my supervision.

Executed on August 1, 2019



Bradley R. Perkins
Assistant General Counsel
Regulatory
Commonwealth Edison Company

CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 1st day of August 2019, a true and authorized copy of Commonwealth Edison Company's Third Set of Responses to Complainant Crown Castle Fiber LLC's First Set of Interrogatories was served on the parties listed below via electronic mail and was filed with the Commission via ECFS and via Hand Delivery (Confidential Version).

Marlene J. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554
ecfs@fcc.gov

(By ECFS for Public Version)

(By Hand Delivery for Confidential Version)

Rosemary McEnery
Federal Communications Commission
Enforcement Bureau
445 12th Street SW
Washington, DC 20554
Rosemary.McEnery@fcc.gov

Adam Suppes
Federal Communications Commission
Enforcement Bureau
445 12th Street SW
Washington, DC 20554
Adam.Suppes@fcc.gov

T. Scott Thompson
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006
scottthompson@dwt.com

Ryan Appel
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006
ryanappel@dwt.com

Maria T. Browne
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006
MariaBrowne@dwt.com

/s/
Timothy A. Doughty